term is defined by a dictionary. Applicant takes the position that the term "re-entrant" is provided a specific definition in the description, and that Applicant's definition provides the meaning for the term as used in the claims.

Applicant's attorney suggested that the examiner reconsider if support for Applicant's position is provided in response to the final rejection.

The above summary is supplemental to the interview summary provided by the examiner. As such, there is a complete and accurate record of the interview.

Response to Final

Claims 2-9 and 11-18 are pending in the application. Claims 2-9 and claims 11-18 stand rejected. Reconsideration of the application is respectfully requested. The Examiner's rejections are addressed in substantially the same order as in the referenced office action.

Claims 2-9 and 11-18 stand rejected as being anticipated by U.S. Patent 5,350,189 to Tsuchitani et el. (the '189 reference). Applicant respectfully traverses, because the examiner has not presented a prima facie case of anticipation.

Each claim in the present application includes the limitation of **one or more re-entrant grooves**, and the limitation is clearly defined in the application as a groove in an element that is larger toward the element center than at the element surface. The specification goes on to provide the benefit of such a groove in that the narrower cross-section at the electrode surface tends to preserve electrode surface area while the wider cross-section below the electrode surface reduces resistance to fluid flow. The disclosure states beginning at page 44 line 1, "As illustrated in FIGS. 14 and 15, the re-entrant grooves 1405, 1410, 1415, and 1420 have a narrower cross-section at the electrode surfaces and a wider cross section below the electrode surfaces. **The narrower cross-section at the electrode surface tends to preserve electrode surface area while the wider cross-section below the electrode surface reduces resistance to fluid flow.**" The art of record does not teach such re-entrant grooves and the disclosed structures in the art do not provide the above-stated advantages.

Applicant's definition of "re-entrant" is clearly provided in the specification. Therefore, the definition provided in the specification controls over the broader dictionary definition of the term, and the ordinary meaning of the term is not to be used in examining the claims. As stated in MPEP 2111.01:

> "(T)he words of the claim must be given their plain meaning *unless applicant has provided a clear definition in the specification* (emphasis added by Applicant). In re Zletz, 893 F.2d 319, 321, 13 USPQ2d 1320, 1322 (Fed. Cir. 1989).

Applicant submits that the term "re-entrant" has been provided a clear definition in the specification as discussed above. Consequently, the limitation "one or more re-entrant grooves" as claimed in independent claims 2 and 11 must be given the meaning provided by Applicant and not, as the Examiner suggests, the broadest meaning using a dictionary definition of the term "re-entrant".

Applicant submits that the Tsuchitani et al. reference (the '189 reference) does not teach or suggest the limitations of independent claim 2, namely an accelerometer, comprising...one or more mass electrodes coupled to the spring mass assembly...a top capacitor electrode having a surface...a bottom capacitor electrode having a surface, wherein the surface of one or more of the mass electrodes, the top capacitor electrode, or the bottom capacitor electrode includes one or more re-entrant openings, **wherein the re-entrant openings include one or more re-entrant grooves**.

Applicant further submits that the '189 reference does not teach or suggest the limitations of independent claim 11, namely a method of operating an accelerometer by...reducing fluid damping between the mass electrodes and at least one of the top capacitor electrode and the bottom capacitor electrode by providing one or more re-entrant openings in a surface of one or more of the mass electrodes, the top capacitor electrode, and the bottom capacitor electrode, **wherein the re-entrant openings include one or more re-entrant grooves**.

The grooves **7** in the '189 reference have a cross section structure nothing like a re-entrant groove as claimed. The grooves **7** are clearly narrower toward the center of the structure **4** than at the structure surface. Therefore, the '189 reference does not teach or suggest a re-entrant groove as claimed, and does not teach a structure providing the advantages of the claimed re-entrant grooved structure. Consequently, the reference fails to teach each and every limitation of the rejected claim(s) as required for anticipation.

Request for Removal of Finality

In the event that Examiner considers further action necessary, Applicant requests removal of finality of this action. Applicant submits that the claims are allowable over the art of record. Applicant further submits that the claims as originally submitted included claims having the limitation "one or more re-entrant grooves." If properly read in light of the definition of "re-entrant" provided in the specification, all searches and arguments available to the examiner could have been made in prior actions. Therefore, Applicant submits that any further argument or search considered necessary by the examiner be made without a request for continued examination.

CONCLUSION

For all the foregoing reasons, Applicant respectfully submits that all remaining claims are in a condition for allowance and requests timely issuance of a notice of allowance. No fee is believed due for this response. The Commissioner is authorized to charge any additional fee due or refund any overpayment to **Deposit Account No. 13-0010 (IO-1002-US)**.

Respectfully submitted,

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